

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

SEN GAO, CONGLI HUO, RUBIN WANG,  
LUXIAO XU, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

SINGULARITY FUTURE TECHNOLOGY,  
LTD. F/K/A SINO-GLOBAL SHIPPING  
AMERICA LTD., YANG JIE, LEI CAO,  
ZHIKANG HUANG, TUO PAN, XIAOHUAN  
HUANG, JING SHAN, TIELING LIU, JING  
WANG, LEI NIE, JOHN LEVY, THOR MINER,  
INC., and GOLDEN MAINLAND, INC,

Defendants.

Case No: 22-cv-07499-BMC

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law dated November 20, 2023 in support of Defendant Lei Cao's Motion to Dismiss the Second Amended Complaint and upon all of the prior pleadings and proceedings herein, Defendant Lei Cao, by and through his attorneys, King & Wood Mallesons LLP, will move this Court, presiding honorable Judge Brian M. Cogan, at the United States Courthouse located at United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY 11201, at a date and time to be designated by the Court, for an order dismissing the Second Amended Complaint against Mr. Cao with prejudice pursuant to Federal Rules of Civil Procedure 12(b)(6).

**PLEASE TAKE NOTICE** that, opposing papers, if any, must be served upon the undersigned by January 5, 2024.

DATED: New York, New York  
November 20, 2023

Respectfully Submitted,

**KING & WOOD MALLESONS, LLP**

By: /s/ Aaron T. Wolfson  
Aaron T. Wolfson (AW7218)  
King & Wood Mallesons  
500 Fifth Avenue, 50<sup>th</sup> Floor  
New York, NY 10110  
aaron.wolfson@us.kwm.com

*Attorneys for Defendant Lei Cao*